



## **BELLINGHAM CITY COUNCIL**

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January 14, 2013

GPT/Custer Spur EIS  
c/o CH2MHill  
1100 112th Avenue NE Suite 400  
Bellevue, WA 98004

Re: Bellingham City Council Scoping Comments on the  
Gateway Pacific Terminal/Custer Spur EIS

Dear Sir or Madam:

This letter expresses the Bellingham City Council's concern about the foreseeable and unavoidable adverse off-site impacts from the Gateway Pacific Terminal project resulting from mining, shipping, and burning of coal, the terminal's primary (and only confirmed) commodity. The City Council requests that the scope of the Environmental Impact Statement ("EIS") include an analysis of impacts related to climate disruption, increased level of toxic metals in water bodies, and increased acidification of water bodies. These potential impacts are further detailed below. These scoping comments are provided pursuant to both the Washington State Environmental Policy Act (SEPA) and the National Environmental Policy Act (NEPA). These scoping comments are submitted to you on behalf of the Bellingham City Council and are in addition to the comments included in previous and separate comment letters submitted on behalf of the City of Bellingham.

### **A. General Comments Regarding Climate Disruption**

Disruption of global climate as a result of on-going greenhouse gas emissions from carbon-based fuel consumption has predictable and measurable effects on northwest Washington and Whatcom County. The mining, shipping, and especially the burning of coal are some of the largest contributing causes of these global climate changes, generating an estimated 1/5 of worldwide greenhouse gas emissions and rising.<sup>1</sup> Moreover, the EPA has recognized CO<sub>2</sub>, the primary greenhouse gas released in coal burning, as a pollutant subject to regulation.

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<sup>1</sup> Center for Climate and Energy Solutions, <http://www.c2es.org/science-impacts/basics/fact-sheets/coal-facts>

Because the proposed Gateway Pacific Terminal is under agreement to become the largest coal shipping facility in North America – up to 48 million metric tons of coal per year – the foreseeable impact of this coal consumption on global climate change, and therefore upon Whatcom County, needs to be determined prior to any decision to grant or deny development permits. These foreseeable impacts are significant and go against the City's plans and efforts to reduce our contributions to climate change,<sup>2</sup> as well as undermine the City's official commitment of a legacy of a "Healthy Environmental Legacy."<sup>3</sup> These impacts also undermine Washington State's greenhouse gas reduction standards and targets.<sup>4</sup>

Furthermore, we believe these foreseeable impacts resulting from coal shipment and consumption should be assessed in conjunction with the several other proposed coal shipping facilities in Washington State, to determine the cumulative impacts that will be felt at the local level within Bellingham and Whatcom County and the entire region. We also believe the scope should include the carbon footprint of the mining and shipping operations, in addition to the direct impacts of coal consumption itself.

Global climate disruption from coal mining, shipping, and consumption takes many forms, most of which stem from underlying increases in average temperatures. In the Pacific Northwest, the increase over the last half century already averages 1.5°F degrees, and predictions suggest a further increase of 3 to 10°F over the next century if fossil fuel consumption continues along current trends.<sup>5</sup> *The many effects of this temperature change need to be included in any EIS evaluation.*

## **B. Specific Comments Regarding the Adverse Impacts from Climate Disruption**

The range of likely local adverse impacts from fossil-fuel induced temperature increases includes:

1. Loss and population disruptions of plant species, affecting individual plant growth and reproduction, including commercial food crops, berries, and tree crops – all of which are important for Whatcom County.
  - ♦ Examination of this impact should consider the loss and disruption of pollinating insect species and symbiotic root fungi, as well as changes in pest species.
  - ♦ Impact analysis should also determine possible decreases in productivity and/or increases in irrigation needs of food crops such as blueberries, strawberries, raspberries, and feed crops for dairy livestock that are the centerpieces of Whatcom County agriculture.

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<sup>2</sup> City of Bellingham, Greenhouse Gas Inventory and Climate Protection Action Plan, May 2007, available at <http://www.cob.org/services/environment/climate/program.aspx>

<sup>3</sup> City of Bellingham, Legacies and Strategic Commitments, available at <http://www.cob.org/documents/council/legacies-commitments.pdf>

<sup>4</sup> See Revised Code of Washington, § 70.235.070(1)(a).

<sup>5</sup> See *Journal of Climate*, 18(21), 4545–4561; and *Journal of Climate*, 19(23), 6209–6220.

2. Disruption, loss, and seasonal shifts in precipitation – increase winter rain and decrease in winter snows, resulting in greater winter peak river flow and flooding; decreased Cascade Mountain snow pack and therefore decreased spring snow melt, resulting in lower and earlier in-stream flows in the Nooksack and other local rivers, and more frequent summer drought conditions in Whatcom County.
3. Lower in-stream flow, and higher average water temperature, harming river-dwelling fish species as well as anadromous fish species; decreased fish reproduction, growth, and survival due to temperature stress; decreased numbers of salmonid fish entering saltwater and the effects on commercial and tribal fishing, and the health of salmon-dependent predators such as the endangered coastal Orca whale.
4. Lower in-stream flow, impacting agricultural irrigation and commercial agriculture's viability, as well as impacting river-dependent residential water consumption for Whatcom County residents, such as in Lynden.
  - ♦ Assessment of this impact should include the availability and use of Nooksack River water to control coal dust at the GPT site, in the context of the limited availability of river water for agricultural irrigation and residential consumption.
5. Changes in rainfall, snow pack, and spring run-off that may impact local ground water and aquifer replenishment, impacting ground-water and well-based water consumption for local agricultural and residential use – both of which are already constrained in Whatcom County by an overcommitted water supply.
6. Lower in-stream flow, eliminating the ability for the City of Bellingham to exercise its water-diversion rights from the Middle Fork of the Nooksack River, into Lake Whatcom, to serve as a municipal drinking water source. Assessment of this impact should include the increased risk that the City will be unable to use this diversion for months out of the year, which could jeopardize drinking water availability for 90,000 customers of the City of Bellingham water utility.
7. Effect of climate changes on Lake Whatcom near-surface water temperature, which creates a summertime risk for harmful algae blooms. Lake Whatcom is an “impaired water body” under section 303(d) of the Clean Water Act for excessive phosphorus,<sup>6</sup> which is directly related to water temperature and algae blooms.
 

Assessment of this impact should evaluate increased likelihood and frequency of summertime algae growth, which necessitates expensive pretreatment of the lake water for human consumption, and which creates oxygen dead zones that harm resident fish populations.
8. Changes in forest productivity and ecology, due to changes in weather patterns and seasonality.
  - ♦ Assessment of this impact should include evaluation of changes in forest fire risk, magnitude, and seasonality; and changes in pest species populations.

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<sup>6</sup> Washington State Department of Ecology, see <https://fortress.wa.gov/ecy/publications/publications/0810068.pdf>

9. Sea level changes from global warming, resulting in coastal erosion and loss of land and its impacts on Bellingham's municipal services, particularly storm water drainage and sewage systems. In particular, City of Bellingham's sewage treatment plant is located on the shoreline very near sea level, and relies upon gravity-fed delivery of untreated sewage, as well as pump-delivery of the treated water to the adjacent Bellingham Bay.

### **C. Comments Related to Other Impacts on Water Bodies**

In addition to the temperature and climate-related impacts discussed above, we are also concerned about other adverse impacts generated by the mining, shipping, and burning of coal. These include other types of emissions and effects that result from coal burning. In particular, these foreseeable adverse impacts include:

1. Increased exposure to toxic metals, such as mercury, via atmospheric release. A 2005 study by the United State Geological Survey concluded that atmospheric transportation from fossil fuel burning in Asia is a primary source of new mercury in Lake Whatcom and other Washington waterways. Assessment of this impact should evaluate the likely increase in the atmospheric deposition of mercury into Lake Whatcom, and the consequent increase in mercury levels in lake water, lake soils, and aquatic species, including sport fish that may be consumed by humans.
2. Increased ocean and lake acidification, as a consequence of the atmospheric release of coal combustion products as well as CO<sub>2</sub> itself.

### **D. Conclusion**

While climate change impacts are driven by human activities across the world, we are concerned about local contributions to these impacts. In particular, given the magnitude of the proposed project and the millions of tons of coal involved, we believe that local impacts from climate change are very likely to be increased due to the Gateway Pacific Terminal proposal, and we therefore feel it is essential to study these foreseeable adverse impacts as part of the EIS process. The City of Bellingham requests that these impacts be included in the scope of the EIS for the GPT permit process.

Sincerely,



Seth Fleetwood, President  
Bellingham City Council